

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

ACTUARIAL CONSULTING SERVICES, INC.)	Case No. <u>8:24cv60</u>
)	
Movant,)	MOTION TO QUASH OR MODIFY SUBPOENA, AND FOR PROTECTIVE ORDER
v.)	
BLUE CROSS AND BLUE SHIELD ASSOCIATION, and THE KRAFT HEINZ COMPANY,)	
)	
Respondents.)	

COMES NOW Movant Actuarial Consulting Services, Inc. (“ACS”) and submits this motion to quash or modify subpoena, and for protective order pursuant to Fed. R. Civ. P. 45 in connection with the subpoenas issued by Respondent Blue Cross and Blue Shield Association (“BCBSA”) and Respondent The Kraft Heinz Company (“Kraft Heinz”). As discussed in the brief and evidence that accompanies this filing, the subpoenas pose an undue burden, as well as seek materials that may be subject to a non-disclosure agreement and that contain ACS’s confidential information and trade secrets. To this extent this motion constitutes a discovery dispute for the purposes of NECivR 7.1(j), the undersigned’s sincere but unsuccessful efforts to resolve this dispute through personal consultation and written communications are discussed throughout the contemporaneously-filed brief and evidence.

WHEREFORE ACS asks that the Court grant its motion and quash or modify the subpoenas issued by BCBSA and Kraft Heinz and issue a protective order as particularly described in ACS's accompanying brief.

DATED this 14th day of February 2024.

ACTUARIAL CONSULTING SERVICES, INC.
Movant,

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CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. I also sent a copy of the foregoing to the following persons by certified and electronic mailing:

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